

74I-0794-000949

**ETHYL CORPORATION**  
**Health and Environment Department**

**ETHYL TOWER, 451 FLORIDA**  
**BATON ROUGE, LOUISIANA 70801**

May 23, 1988



84940000049

RECEIVED  
JUL 26 1988  
FBI

MAY 24 1988

PAB

Contains No CBI

Mr. Robert Brink  
Executive Secretary  
TSCA Interagency Testing  
Committee (TS-792)  
U. S. Environmental Protection Agency  
401 M Street, S.W.  
Washington, DC 20460



FYI-94-000949

INIT 07/26/94

Dear Mr. Brink:

RE: Decabromodiphenyl oxide, Octabromodiphenyl oxide,  
Hexabromocyclododecane, Pentabromodiphenyl oxide

Ethyl Corporation is submitting the enclosed information in response to ITC's request for comments and data on brominated flame retardants.

Ethyl is a manufacturer of decabromodiphenyl oxide (1163-19-5), octabromodiphenyl oxide (32536-52-0), pentabromodiphenyl oxide (32534-81-9), and hexabromocyclododecane (3194-55-6). For your information, we have enclosed the following technical and toxicity data:

1. Saytex® Flame Retardants Product List (Ethyl Chemicals Group).
2. Technical Bulletins for decabromodiphenyl oxide, octabromodiphenyl oxide, and hexabromocyclododecane.
3. Material Safety Data Sheets for decabromodiphenyl oxide, octabromodiphenyl oxide, pentabromodiphenyl oxide, and hexabromocyclododecane.
4. Toxicology tests on:

Decabromodiphenyl oxide:

- Determination of DBDPO in rat livers (5/2/80)
- 90-day subchronic study in rats [Tracor-Jetco]
- Comedogenicity (9/21/81)
- Eye irritation (3/24/86)
- Human repeat insult patch test (6/4/75)
- 13-week feeding study in mice (7/27/79) [Tracor-Jetco]

Mr. Robert Brink  
May 23, 1988  
Page 2

Octabromodiphenyl oxide:

- 1-hour dust inhalation (1/31/84)
- Two year dietary study in rates (?) paper/Dow
- Acute oral toxicity (12/5/83)
- Dermal irritation (11/29/83)
- Eye irritation (12/5/83)
- Ames test (7/1/85)
- Dose Range Finding Study (12/7/84)
- Embryo/fetal toxicity (4/15/85) & Review

Hexabromocyclododecane:

- Ames test (11/17/78)
- Inhalation LC<sub>50</sub>/Dermal LC<sub>50</sub> (11/7/78)
- Primary dermal irritation/dermal corrosion/ocular irritation/oral LD<sub>50</sub> (10/17/78)

Pentabromodiphenyl oxide:

- Acute inhalation in rates (11/77)
- Acute oral toxicity in rates (11/84)
- Ames test (12/85)
- Bromacnegenic (9/77)
- Acute toxicity (9/77)
- Acute oral and percutaneous toxicity (9/77)
- Delayed hypersensitivity (10/77)
- Embryo/fetal toxicity (4/15/85)

In addition, under separate cover as attachment, Ethyl is submitting proprietary information which we are requesting the ITC to hold as "TSCA Confidential Business Information".

If you have any questions, please call me at (504) 388-7650.

Sincerely,



Louise L. Wen  
Regulatory Affairs Associate

LLW/ccj  
2600r

0004